



Florida Department of Agriculture and Consumer Services
CHARLES H. BRONSON, Commissioner
The Capitol • Tallahassee, FL 32399-0800

Please Respond to:

Division of Aquaculture
1203 Governors Square Blvd, Fifth Floor
Tallahassee, Florida 32301

June 13, 2005

Regulatory Analysis and Development, PPD, APHIS
Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238

RE: Docket No. 05-015-1

Dear Sir/Madam:

Please accept these comments in opposition to imposing individual or lot identification requirements and tracking relative to cultured aquatic animals.

There are no parasites or pathogens, animal or human, associated with aquacultured species that are not already reported, tracked, or managed by national programs. The greatest life-threatening issue is those pathogens associated with cultured shellfish (oysters, clams, scallops, and mussels) grown, harvested, packaged and distributed for human consumption. The National Shellfish Sanitation Program was created in 1925 through a partnership between the U.S. Food and Drug Administration, shellfish industry, and state governments to manage those complex food safety issues.

Animal health risks are addressed through national and international reliance on health inspection and associated documentation that accompanies the individual species or shipment of species. Currently, a federal interagency effort is working on a national aquatic animal health plan. Producer input from a series of national workshops for each principle industry segment has not identified the need or support for animal identification.

Logistically and fiscally, the 6,653 aquaculture farms that sell live fish, molluscs, crustaceans, and reptiles as life stages from fertile egg to sexual mature adult will not be easily or inexpensively marked, tracked, or reported. The cost and effort to monitor huge variety of animals that are produced in high volume with low farm gate value will yield little to no practical result.

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In addition, Florida law requires that aquaculturists annually register and pay a fee for each of their production facilities as a component of a resource and environmental management program. Registered facilities are assigned a unique number that must be included on all business related paperwork (bills of sales, lading, invoices, shellfish tags, etc.). This number must accompany the product to the ultimate purchaser. Any aquacultured product not numbered is subject to wild resource regulations and destruction. The proposed National Animal Identification System (NIAS) duplicates this effort.

We recommend that the NAIS plan recognize the unique nature of U.S. aquacultured species and defer aquatic animal health issues (monitoring, surveillance, diagnosis, control, eradication, and extension) to the National Aquatic Animal Health Task Force, or, at a minimum, postpone placing aquaculture species under the generic NAIS plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Sherman Wilhelm', with a long horizontal flourish extending to the right.

R. Sherman Wilhelm, Director
Division of Aquaculture